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16 **UNITED STATES DISTRICT COURT**

17 **FOR THE**

18 **NORTHERN MARIANA ISLANDS**

19 **ABELLANOSA, JOANNA et. al.,**) **Civil Action No. 05-0010**
20 **Plaintiffs,**)
21 **vs.**)
22 **L&T INTERNATIONAL CORPORATION.**) **ERRATUM TO DEFENDANT'S**
23 **Defendant.**) **MOTION FOR SUMMARY**
24 **JUDGMENT**
25

26
27 Defendant through undersigned counsel hereby files this Erratum to Defendant's Motion
28 for Summary Judgment. Defendant filed electronically on August 4, 2006 the Declaration of
29 Corazon Quing in Support of its Motion for Summary Judgment. The Declaration of Corazon

1 Quing in Support of Defendant's Motion for Summary Judgment was assigned as document
2 number 37. Defendant failed to incorporate in document number 37 the Exhibit A attached to the
3 Declaration of Corazon Quing.

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5 Defendant now files this Erratum with the Exhibit A of the Declaration of Corazon Quing
6 in Support of Defendant's Motion for Summary Judgment.

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8 Respectfully submitted this 11th day of August 2006.
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11 /s/ Steven P. Pixley
12 **STEVEN P. PIXLEY, Esq.**
13 Attorney for Defendant
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FINISHING SECTION-RIF

May 13, 2004

COMPLAN

Good afternoon everybody. We are once again gathered in this very same room where we first met each other.

Thank you for being here with us this afternoon.

Before anything else, on behalf of the management team, we would like you to know that we sincerely appreciate your contribution to our company.

As what most of you already aware of, the company is embarking on a lot of re-engineering or productivity and efficiency studies in our operations. Finishing area is just one of those areas in study. These same redesigning principles are being observed as we speak, with identified production support groups and administrative offices.

We called on you today because CGMC is undergoing a company-wide restructuring program, which involved the review of our present headcount/manpower. In business, sometimes we need to make difficult decisions, no matter how painful they are, in order to make the business survive.

Today, we will be issuing all of you a Notice of Termination effective 10 days upon receipt. Your last day of employment would be on May 23, 2004. Out of consideration, have prepared your paychecks for the period of April 25 to May 8 and for the period of May 9, to May 13, 2004. Together with our cover letter, we are distributing an equivalent amount of your 10 days work from today. You do not have to report for starting tomorrow.

It is with much regret that we have to let go of your employment. We hope that in a short period of time, you have witnessed the sincere desire of the company to help and assist you in your needs. We also hope that some of you have gained the necessary skills and experience that you can start with in facing your future challenges.

We would appreciate if you can sign on or acknowledge your receipt of the "Notice of Termination" and your paychecks. Please do not forget to also surrender your Ids as it is part of your clearance.

Should we have any available positions for you in the future, rest assured that your performance during your stay with us will be assessed and your re-employment with us will be reconsidered.

We sincerely hope we would still have a chance to work with each other someday. We wish you good luck and we shall pray for all of you.

Exhibit "A"